

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

KESIA PRICE, Individually and on Behalf  
of All Other Persons Similiary Situated,

Plaintiffs,

-against-

PORTER NOVELLI, INC. and OMNICOM  
GROUP, INC.,

Defendants.

07 Civ. 5869 (PAC)

**REPLY TO COUNTERCLAIM**

Plaintiff, Kesia Price by and through her undersigned counsel, hereby reply to the Counterclaim of Defendant, Porter Novelli, Inc. ("Porter Novelli"), dated August 15, 2007 (the "Counterclaim") as follows:

1. Admits
2. Admits.
3. Paragraph 3 of the Counterclaim contains statements and/or conclusions of law as opposed to allegations of fact and as such, no reply is required.
4. Plaintiff cannot admit or deny the allegations set forth in Paragraph 4 of the Counterclaim Counterclaim.
5. Plaintiff cannot admit or deny the allegations set forth in Paragraph 5 of the Counterclaim.
6. Plaintiff denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 6 of the Counterclaim.

7. Plaintiff admits that her employment ended with Porter Novelli on or about September 1, 2006 and denies the remaining allegations of Paragraph 7 of the Counterclaim.
8. Plaintiff denies the allegations of Paragraph 8 of the Counterclaim.
9. Plaintiff denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 9 of the Counterclaim.
10. Plaintiff denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 10 of the Counterclaim.
11. Plaintiff denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 11 of the Counterclaim.
12. Plaintiff denies the allegations set forth in Paragraph 12 of the Counterclaim.
13. Answering Paragraph 13 of the Counterclaim, Plaintiff realleges her responses and incorporates by reference her answers to Paragraphs 1 through 12 as if they were set forth again herein.
14. Plaintiff admits that she was given an AMEX card by Porter Novelli and denies the remaining allegations of Paragraph 14 of the Counterclaim.
15. Plaintiff denies the allegations set forth in paragraph 15 of the Counterclaim.
16. Plaintiff denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 16 of the Counterclaim.
17. Plaintiff denies the allegations set forth in paragraph 17 of the Counterclaim.
18. Plaintiff denies the allegations set forth in paragraph 18 of the Counterclaim.

19. Answering Paragraph 19 of the Counterclaim, Plaintiff realleges her responses and incorporates by reference her answers to Paragraphs 1 through 12 as if they were set forth again herein.
20. Plaintiff denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 20 of the Counterclaim.
21. Plaintiff denies the allegations set forth in paragraph 21 of the Counterclaim.
22. Plaintiff denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 22 of the Counterclaim.
23. Plaintiff denies the allegations set forth in Paragraph 23 of the Counterclaim.
24. Plaintiff denies the allegations set forth in Paragraph 24 of the Counterclaim.
25. Answering Paragraph 25 of the Counterclaim, Plaintiff realleges her responses and incorporates by reference her answers to Paragraphs 13 through 24 as if they were set forth again herein.
26. Plaintiff denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 26 of the Counterclaim.
27. Plaintiff denies the allegations set forth in Paragraph 27 of the Counterclaim.
28. Plaintiff denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 28 of the Counterclaim.
29. Plaintiff denies the allegations set forth in Paragraph 29 of the Counterclaim.
30. Plaintiff denies the allegations set forth in Paragraph 30 of the Counterclaim.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff prays for judgment in her favor and against the Defendant Porter Novelli, Inc. providing that:

- a. The Counterclaim be dismissed in its entirety with prejudice and that Defendant take nothing by its Counterclaim.
- b. Plaintiff be awarded her reasonable attorney fees and the costs of this action.
- c. Plaintiff be awarded such further and other relief as the Court may deem just and proper.

Dated: New York, New York  
October 1, 2007

LOCKS LAW FIRM PLLC

By: 

Fran L. Rudich (FR 7577)

110 East 55<sup>th</sup> Street, 12<sup>th</sup> Floor  
New York, New York 10022  
(212) 838-3333

Jeffrey Gottlieb (JG7905)  
BERGER & GOTTlieb  
150 East 18<sup>th</sup> Street, Suite PHR  
New York, New York 10003  
(212) 228-9795

Alexander Barnett  
The Mason Law Firm  
1120 Avenue of the Americas, Suite 4019  
New York, New York 10036  
(212) 362-5770